ABSTRACT
        This case study was undertaken in order to discover
if there are different types of policy language, and, if so, to
describe relationships between policy language types and policy
implementation. Content analysis of three drafts of the state
educational policy, "Standards for Approving Vermont's Public
Schools," demonstrated the presence of three types of policy
language: philosophical (which describes a goal), professional (which
describes the desired output of an activity), and prescriptive (which
mandates an activity or stipulates certain conditions). During the
policy making process, individuals and interest groups attempted to
influence policy by shifting statements from one language category to
another. Content analysis revealed random discrepancies between the
approved policy and regulatory guidelines. Policy language type had
minimal impact during policy implementation by school personnel,
unless significant implementation conditions were present. For
external evaluators, however, policy language type evoked
differential responses. The study concludes that policy detached from
the conditions for implementation is not likely to be reflected in
school practice. (TE)

THE LANGUAGE AND IMPLEMENTATION

OF

STATE EDUCATIONAL POLICY

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for:

American Educational Research Association

April 1986

ABSTRACT

The research problem for this case study was to discover if
there were different types of policy language, and, if so,
to describe any relationships which might exist between
policy language types and policy implementation. Content
analysis of three drafts of the state educational policy,
"Standards for Approving Vermont's Public Schools,"
demonstrated the presence of three types of policy
language: philosophical, professional and prescriptive.
Philosophical language describes a goal; professional
language describes the desired output of an activity; and
prescriptive language mandates an activity or stipulates
certain conditions of an activity. During policy making,
individuals and interest groups attempted to influence
policy by shifting policy statements from one language
category to another. Content analysis revealed random
discrepancies between the approved policy and regulatory
guidelines. Policy language type had minimal impact during
policy implementation by school personnel. Few conditions
promoting policy implementation were present. However,
conditions promoting implementation were present for
external evaluators. Policy language type did have an
impact during this stage of implementation. This study
concluded that three policy language types were present in
the selected policy. Furthermore, policy language type
affected implementation when significant implementation
conditions were present, and, in the absence of these
conditions, language type did not affect implementation.
It was noted, finally, that policy making occurred in an
arena in which policy makers assumed that policy language
was significant and that a tight relationship existed
between language and implementation.

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The literature on policy implementation over the past
fifteen years includes at least three critical themes: the lack
of control over the implementation process (Elmore, 1978), the
gap between policy makers and policy implementors (Wise, 1979),
and the need for theoretical and practical change in the
policymaking system (Berman, 1981). Concurrent with these
criticisms of the policy process is the expanded state activity
in educational policy making.

However, neither the increase in policy making nor the
increase in criticism has addressed directly the role of policy
language. This is surprising since it is policy language which
permeates the policy process--from policy making, to
implementation, to evaluation.

Two major themes emerged from the policy implementation
literature regarding policy language: first was the need for
policy clarity, and second were hypotheses relating general or
specific policy language to implementation. Rein and Rabinovitz
(1978), Sabatier and Mazmanian (1980) and Schneider (1982)
discussed policy clarity as one essential condition for effective
implementation. However, while Rein and Rabinovitz, for example,
claimed that "legislation can be classified in terms of how clear
it is about what it wants to accomplish," no classification of
policy language was found.

Berman (1980) in his theory about programmed and adaptive
implementation referred to ambiguous policy goals and specific
policy goals. Some problems with adaptive implementation

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occurred because of "overspecification and rigidity of goals." Adaptive implementation might succeed when there are "rules that allow multiple participants to bargain and compromise."

Like Montjoy and O'Toole (1979), Berman implied that policy language could be identified as general or specific, and that each language type had some relationship to policy implementation. The assumption was that general and specific policy language contained characteristics which determined the potential degree of discretion for policy implementors.

From these two themes in the literature came two questions which drove this case study: first, were there functional categories of policy language (beyond vague ard specific), ano second, if language categories existed, were there any relationships between these categories and policy implementation.

The Policy

The policy studied was "Standards for Approving Vermont's Public Schools," adopted by the Vermont State Board of Education in 1984. The 21 pages of policy statements included standards for graduation requirements, school leadership, academic and vocational subjects, facilities and more. The policy meant to be comprehensive and was one of the State's responses to statewide and national calls for educational improvement.

Description of a Language Typology

Analysis of early policy drafts, interviews with policy makers, and observations during policy making meetings led to the hypothesis that three types of policy language existed.

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Construction of the three categories was completed by following
guidelines suggested by content analysts (Stone et. al., 1966;
Holsti, 1969). The three language types were:

1. Philosophical: described a general goal;

     difficult to measure or observe reliably

     at a specific time and place;

     required interpretation at implementation

     site;

     required broad-tas⁻¹ personnel support.

Example: "Students have a genuine opportunity to complete
an elementary and secondary program of studies and to
receive a diploma."

2. Professional: described the desired output of an

     activity;

     relied upon qualitative methodology to

     evaluate compliance;

     variety of local methods developed to

     achieve desired output;

     required support of a group within the

     school.

Example: "The school's curriculum is coordinated with
sending and receiving schools."

3. Prescriptive: mandated a specific activity or conditions

     of an activity;

     could be measured or observed reliably at

     a specific time and place;

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statement specificity limited degree of
local adaptation;
personnel responsibility was narrow and
identifiable.

Example: "All teachers and staff are certified to teach
or provide services in the areas to which they are
assigned."

Five sections of the policy were studied: general academic
requirements, school climate, language arts, mathematics, and
staff development. The unit of analysis, for applying the
language category criteria, was the sentence. The five sections
of policy contained 79 sentences:

Philosophical   9

Professional   33

Prescriptive   37

Policy Implementation

Three Vermont high schools participating in the school
approval process were chosen for this study. High school
personnel, predominantly teachers, responded to the policy
statements in a written self-assessment comparing their school to
the standards outlined in the policy. Two months after this,
teams of educators (trained by the Vermont Department of
Education) visited the schools for three days to compare the
schools to the policy standards, and then wrote evaluation
reports.

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Two types of data were collected during implementation: data from the self-assessment and visiting team documents, and ata describing the procedural context for the two activities—gathered by interviews and observations of key events at the schools.

Document Analysis

Three meta-matrices, described by Miles and Huberman (1984) as "master charts (for) assembling descriptive data from each of several sites in a standard format," were used to assist in document analysis. One meta-matrix was developed for each of the three policy language types. Each line of cells in a matrix contained:

1. Policy sentence

2. School #1 response to the policy sentence. The response
   was labelled in one of three ways:

   a. stating compliance

   b. stating non-compliance

   c. not addressing the policy statement

3. School #2 response

4. School #3 response

5. Visiting team #1 response

6. Visiting team #2 response

7. Visiting team #3 response

(same range of responses as #2)

These matrices yielded the following numerical data:

LANGUAGE TYPE	3 SCHOOLS' RESPONSES	3 VISITING TEAMS' RESPONSES
Philosophical (9)		
Compliance	19	17
No Response	8	9
Non-Compliance	0	1
Professional (33)		
Compliance	62	30
No Response	35	30
Non-Compliance	2	39
Prescriptive (37)		
Compliance	69	23
No Response	29	37
Non-Compliance	13	51

This data revealed significant discrepancies between the
schools' self-assessments and the visiting teams' evaluations.
Regardless of language type, schools most often declared
themselves in compliance with policy statements. Visiting teams,
however, most often declared schools to be non-compliant. Two
questions emerged:

1. What accounted for the dramatic differences between the
   schools' responses and the visiting teams' responses?

2. Why did language type not seem to affect school personnel
   writing the self-assessment, while it did seem to affect
   visiting team members (i.e the more prescriptive the

policy statements, the more frequent the findings of non-compliance)?

It was hoped that interviews and observations of school personnel and visiting team members during implementation would provide some answers to these questions.

Procedural Analysis

Review and coding of interview and observation notes suggested the importance of eight conditions for implementation:

1. decision to participate in the approval process;

2. time available to implement policy;

3. familiarity with policy;

4. familiarity with, and access to, data sources;

5. ability to accelerate implementation process;

6. audience identification;

7. local leadership;

8. perceived significance of incentives/disincentives;

These eight conditions were related to the six implementation variables most often mentioned in the literature as variables which can lead to successful implementation (Berman, 1980; Montjoy and O'Toole, 1979; Rein and Rabinovitz, 1978; Sabatier and Mazmanian, 1980; Schneider, 1982; Van Meter and Van Horn, 1975):

1. clarity of the policy;

2. characteristics of the implementing organization;

3. disposition of the implementors;

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4. characteristics of interorganizational relationships;

5. level of available resources (including capacity);

6. degree of environmental stability ("social, economic, and
   political conditions within the implementing
   organization's jurisdiction," (Van Meter and Van Horn,
   1975).

There was a marked absence of key implementation variables
during the compilation of data and the writing of the self-
assessments, while there was an evident presence of these
variables throughout the activities completed by the visiting
teams.   The chart below synthesizes data collected from the
interviews and observations:

IMPLEMENTATION VARIABLE

	SCHOOLS	VISITING TEAMS
1. Clarity of policy	Major problem	Minor problem
2. Characteristics of the implementing organization	Major problem	Major asset
3. Disposition of the implementors	Major problem	Major asset
4. Characterisitics of the interorganizational realtionship	Problem	Minor asset
5. Level of available resources	Major problem	Minor asset
6. Environmental stability	Problem	Major asset

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Conclusions

This study had five conclusions:

1. Three functional categories of policy language existed in "Standards for Approving Vermont's Public Schools": philosophical, professional and prescriptive.

2. In the absence of significant conditions (variables) promoting implementation, policy language type was not significant for school personnel. These individuals did not choose to participate in the approval process, possessed few resources to complete implementation, maintained significant control over their involvement in implementation, perceived few incentives, had minimal concerns about potential disincentives, and questionned the goals of the po'icy. Within this context, any assumed link between language type and policy implementation was not justified.

3. Given the presence of many significant implementation variables, language type itself was significant. Visiting team member' responded differently to each type of policy language because they chose to participate, were provided sufficient resources, and thought they were providing an essential service to the schools. Within this context, policy language type mattered. However, it must still be noted that more than one-third of all policy statements still were not addressed by the visiting teams or the schools.

4. Interest groups--including the Vermont Department of Education--acted during policy making and policy implementation

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or the assumption that policy language was signficant and that a tight relationship existed between language and implementation. Represen atives of school administration supported language which was philosophical and opposed prescriptive policy statements. Even though many administrators might have supported the content of a prescriptive policy statement (such as lower student-teacher ratios), they opposed the statement because of the implied loss of local control to set that ratio. At issue was not the content of the statement, but the implied state/local relationship.

Most representatives of teacher and staff organizations supported professional and prescriptive language. They were less concerned about the state/local relationship and, in fact, often considered the state as a potential change agent at the local level. Teachers and staff were more concerned with the immediate gain (lower class size) than the implied state/local relationship.

However, it is important to reiterate that representatives from all interest groups assumed that how each policy statement was written would affect policy implementation. As content analysis of the schools' self-assessments demonstrated, that assumption was not totally correct. Policy makers debated policy within the traditional, "rational," policy model. This model assumed the presence of meaningful links (variables) between policy makers and policy implementors (i.e. the state and the schools), and that policy debated and adopted would be implemented in good faith.

5. Policy detached from the conditions for implementation is

not just poor policy, but can become symbolic policy—policy
which can subvert a public policy process by creating a policy
making arena in which actors make policy for personal gain,
political legitimation (Weiler, 1981), or public consumption
(Edelman, 1977). It is policy which will not affect the supposed
implementation sites as publicly declared, and thus reveals the
depth of the chasm separating policy makers from policy
implementors, and the supposed beneficiaries of the original
policy (Wise, 1979).

Final Note

This research contains the inherent limitations of most case
studies, i.e. studies which are context-dependent. As Mishler
(1979) has noted, the problem is "how can we formulate
generalizations that make explicit the context-dependence of
relationships?" It is hoped that the development of this policy
language typology, and these early analyses, will promote further
tef .ing of the role policy language plays in the entire policy
process—from policy making, through implementation, to
evaluation.

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